

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: Joseph Capurso : No. 5:21-bk-01868-MJC
Debtor : Chapter 13
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THE BANK OF NEW YORK MELLON, : F/K/A THE BANK OF NEW YORK AS : TRUSTEE FOR REGISTERED HOLDERS : OF CWABS, INC., ASSET-BACKED : CERTIFICATES, SERIES 2005-14 : Movant : Motion for v. : Relief from Stay Joseph Capurso : Debtor, : Christina E. Capurso : Co-Debtor, : and : Jack N Zaharopoulos : Trustee : :
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DEBTOR'S ANSWER TO MOTION OF THE BANK OF NEW YORK MELLON, F/K/A THE
BANK OF NEW YORK AS TRUSTEE FOR REGISTERED HOLDERS OF CWABS, INC.,
ASSET BACKED CERTIFICATES, SERIES 2005-14
FOR RELIEF FROM STAY

AND NOW COMES Debtor, Joseph Capurso, by and through his attorneys, Newman, Williams, P.C., and in Answer to the Motion of THE BANK OF NEW YORK MELLON, F/K/A THE BANK OF NEW YORK AS TRUSTEE FOR REGISTERED HOLDERS OF CWABS, INC., ASSET-BACKED CERTIFICATES, SERIES 2005-14 for Relief from Stay aver as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted

5. Denied. This paragraph represents a legal conclusion to which no response is necessary.

To the extent the Court determines there to be a factual averment in this paragraph requiring response it is specifically denied.

6. Denied. After reasonable investigation the Debtors are without knowledge sufficient to form a belief as to the truth of these averments.

7. Denied. After reasonable investigation the Debtors are without knowledge sufficient to form a belief as to the truth of these averments.

8. Denied. This paragraph represents a legal conclusion to which no response is necessary.

To the extent the Court determines there to be a factual averment in this paragraph requiring response it is specifically denied.

9. Denied. After reasonable investigation the Debtors are without knowledge sufficient to form a belief as to the truth of these averments.

10. Denied. This paragraph represents a legal conclusion to which no response is necessary.

To the extent the Court determines there to be a factual averment in this paragraph requiring response it is specifically denied.

11. Denied. This paragraph represents a legal conclusion to which no response is necessary.

To the extent the Court determines there to be a factual averment in this paragraph requiring response it is specifically denied.

WHEREFORE, Debtor, Joseph Capurso, respectfully prays this Honorable Court for an Order that the Motion of THE BANK OF NEW YORK MELLON, F/K/A THE BANK OF NEW YORK AS TRUSTEE FOR REGISTERED HOLDERS OF CWABS, INC., ASSET-BACKED CERTIFICATES, SERIES 2005-14 for Relief from Stay be denied and for such other and further relief as the Honorable Court deems just and appropriate.

NEWMAN WILLIAMS, P.C.

By: /s/ Robert J. Kidwell

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